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10 *Shulim Leifer*

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15  
16 SHULIM LEIFER

Case No. 3:22-mc-80319

17 Movant,

18 v.

19 TWITTER, INC.

20 Respondent.

**DECLARATION OF ALEXANDER  
URBELIS IN SUPPORT OF PLAINTIFF  
SHULIM LEIFER'S NOTICE OF MOTION  
AND MOTION TO COMPEL TWITTER,  
INC. TO RESPOND TO SUBPOENA;  
MEMORANDUM OF POINTS AND  
AUTHORITIES**

21 Date: TBD  
22 Time: TBD  
22 Ctrm: TBD  
23 Judge: TBD

24  
25 I, Alexander Urbelis, hereby declare and state as follows:

26 1. I am a senior counsel at Crowell & Moring LLP, and am counsel for movant  
27 Shulim Leifer ("Leifer") in the above captioned matter. I have personal knowledge of the facts

1 set forth below, except when such matter is stated upon information and belief and, as to those  
2 facts, I believe them to be true. If called as a witness, I could and would testify competently  
3 thereto.

4       2. Pursuant to the Order on Expedited Discovery and concurrent Subpoena (attached  
5 as Exhibits 4 and 1 to the Declaration of Warrington Parker), Twitter's counsel, Norton Law  
6 Firm, PC, contacted Crowell & Moring, LLP to meet and confer concerning compliance with the  
7 Subpoena. Parker Decl., Exh. 1, 4. Counsel for Plaintiff and Twitter participated in three meet-  
8 and-confer conferences (June 13, June 24, and June 30) and filed two joint motions seeking an  
9 extension to Twitter's deadline to file any motion contesting the Subpoena. Throughout the  
10 discussions, Leifer made it clear that he was willing to narrow the scope of the subpoena or  
11 accept fewer data points (*e.g.*, only IP addresses and dates) to avoid having to file a motion to  
12 compel Twitter's compliance. Twitter refused all efforts to compromise and insisted Leifer file  
13 this motion to compel, as opposed to Twitter filing a motion to quash or modify the Subpoena  
14 before Judge Balsara.

15       I declare under penalty of perjury under the laws of the State of California and the United  
16 States of America that the foregoing is true and correct.

17       Executed on November 21, 2022, in New York, New York.  
18

19 Dated: November 21, 2022

CROWELL & MORING LLP

20 By:   
21

22       Alexander Urbelis  
23       Attorney for Movant  
24       Shulim Leifer